



1700 Seventh Ave, Suite 2100 | Seattle, WA 98101

October 17, 2022

**VIA ELECTRONIC FILING**

Honorable Gene E.K. Pratter  
United States District Court for the Eastern District of Pennsylvania  
James A. Byrne U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

**Re: Bethany Katz v. DNC Services Corporation, et al.  
Docket No. 2:16-cv-05800-CDJ**

Dear Judge Pratter:

Please accept this joint letter regarding the status of this matter and the parties' request for additional time to file a motion for preliminary approval.

As the parties explained in prior submittals to the Court (Dkt. # 224-225, 227), they have reached an agreement in principle to settle this complex hybrid class action. On September 20, 2022, the Court ordered that the parties submit their motion for preliminary approval of the finalized settlement agreement by October 17, 2022 (Dkt. # 228).

The parties hereby request additional time to submit the motion for preliminary approval because they have not yet executed a final version of the settlement agreement. The parties have continued to work diligently to finalize the written settlement agreement, and are now resolving a few final remaining material issues. Once the agreement is finalized, the plaintiff will then submit a motion for preliminary approval.

The parties commit to continuing to work diligently to finalize the agreement and request that the Court set November 23, 2022 as the date by which the motion for preliminary approval will be filed. The parties anticipate that a final written agreement will be reached by this date. In the event that does not occur, they will meet and confer to propose an alteration to this date.

We thank the Court for its consideration to this request.

Respectfully submitted,

*/s Ben Stafford*

Ben Stafford, Esq.

**Elias Law Group LLP**

1700 Seventh Ave, Suite 2100

Seattle WA 98101

206-656-0176

bstafford@elias.law

*/s Lindsay McAleer*

Lindsay McAleer, Esq.

**Elias Law Group LLP**

1700 Seventh Ave, Suite 2100

Seattle WA 98101

206-656-0235

lmcaleer@elias.law

*/s Justin L. Swidler*

Justin L. Swidler, Esq.

**Swartz Swidler, LLC**

1101 Kings Hwy, N. Ste 402

Cherry Hill, NJ 08034

Phone: (856) 685-7420

jswidler@swartz-legal.com